

EXHIBIT T

1 UNITED STATES DISTRICT COURT
2 CENTRAL DISTRICT OF CALIFORNIA
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4 THE WIMBLEDON FUND, SPC (CLASS)
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PLAINTIFFS,

VS. CASE NO. 2:15-CV-6633-CAS-ASJWx

GRAYBOX LLC; INTEGRATED
ADMINISTRATION; EUGENE SCHER, AS
TRUSTEE OF BERGSTEIN TRUST; AND
CASCADE TECHNOLOGIES CORP.,
DEFENDANTS.

16 VIDEOTAPED DEPOSITION OF KIARASH JAM, 30(B)(6) taken on
17 behalf of the Plaintiff, at 10100 Santa Monica Boulevard,
18 13th Floor, Los Angeles, California, commencing at
19 9:57 a.m., Thursday, March 28, 2019, before Sandra Mitchell,
20 C.S.R. 12553, pursuant to Notice.

11:18:05 1 increase in salary was warranted?

2 A He was the one who was bringing in the funding.

3 I didn't care if he increased his salary.

4 Q Okay. Well, let me ask you this: Why was

11:18:15 5 Mr. Bergstein receiving a salary in the first place from

6 Integrated Administration?

7 A Because he was doing a lot of work, and he was

8 funding IA, and he wanted to be on the payroll.

9 Q And what do you mean by "he was doing a lot of

11:18:26 10 work"? What work are you referring to?

11 A He worked on all the transactions. He was

12 working with the Weston guys, he was working with

13 Sovrin, he was working on a number -- on all kinds of

14 transactions all day, all day every day.

11:18:40 15 Q Do you know what his salary was before you

16 requested an increase to \$300,000 per year?

17 A I don't recall what it was.

18 Q And you were receiving a salary from Integrated

19 Administration as well; right?

11:18:53 20 A On and off, yes.

21 Q Okay. And --

22 A When there wasn't money I wouldn't take a

23 salary. There was plenty of times where everybody else

24 got checks and I didn't.

11:19:01 25 Q Okay. And what work were you doing for

11:19:04 1 Integrated Administration that warranted a salary?

2 A I was in the office, I was -- I was the guy in
3 the office. That's why I was an officer of a bunch of
4 these companies. I was the guy that had a guy to scan
11:19:14 5 it. I had access to the copier. Nobody else was
6 around. David was always out. His voice mail was full
7 by 7:00 a.m. The Weston guys lived in other states.
8 That's why I ended up becoming -- they'd sign on a bunch
9 of these companies. That's what I did. I was in the
11:19:28 10 office doing my work, trying to generate money to feed
11 IA, and I did that myself.

12 Q Okay. Is it fair to say that the work you were
13 doing was arranging for the transfers of monies that
14 Mr. Bergstein requested of you?

11:19:42 15 A Say that one more time?

16 Q Is it fair to say that the work that you were
17 doing for IA was arranging for the transfers of monies
18 that Mr. Bergstein requested of you?

19 A That was part of what I did, yes.

11:19:50 20 Q Okay. What else did you do?

21 A I made movies, I was developing stuff. I
22 consulted for Broadway 4D. I did whatever I could do to
23 try to generate money.

24 Q And you consider that work that you were
11:20:01 25 performing for Integrated Administration?